

EXHIBIT 4



IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA

ELIZABETH SINES et al.,

Plaintiff

vs.

JASON KESSLER et al.,

Defendant

CASE NO: 3:17cv00072

(J. Moon, Magistrate J. Hoppe)

DEFENDANT MATTHEW HEIMBACH'S RESPONSES TO DEFENDANT'S FIRST
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

Now comes defendant Matthew Heimbach and responds to defendants first set of Interrogatories and Request for Documents as follows:

I. DISCOVERY REQUESTS

1. Identify all means of communication used by you to communicate concerning the Events, whether before, during, or after the Events, and for each means of communication, identify all names, aliases, e-mail addresses, phone numbers, and Social Media Handles you used in connection with such communications, including the 18-digit account identifier associated with any Discord account used by You. Means of communications include, but are not limited to, telephone calls, in-person meetings, and all means of electronic communication including, for example, Social Media, email, SMS messages, podcasts, and online video.

ANSWER: Gab.ai: (MatthewWHeimbach), VK (MatthewHeimbach), Facebook: (MatthewJohnHeimbach/shutdown by Facebook), twitter: (MatthewHeimbach/shutdown by twitter), Discord: Charlottesville Planning Discord/shutdown, TWP Discord/shutdown (discord handle "Heimbach").

2. Identify any "channel" or "server" on Discord to which you had access.

ANSWER: See above answer to #1.

3. Identify all persons (natural or non-natural) with whom you communicated concerning the Events, whether before, during, or after the Events.

ANSWER: Ike Baker, Mike Peinovich, Jason Kessler, Eli Mosely, Jeff Schoep,

Matt Parrott, Tony Hovater.

4. Identify all Electronic Devices used by you to communicate concerning the Events, whether before, during, or after the Events.

ANSWER: cellular phone (301) 525-1474),

II. DOCUMENT REQUESTS

1. All Documents and Communications concerning the Events, including without limitation all

documents and communications:

- i. concerning any preparation, planning, transportation to, or coordination for, the Events, including receipts, bills and credit card statements reflecting costs for transportation, lodging, apparel, gear, or any other material purchased for the Events;
- ii. concerning any instructions or coordination relating to the Events, including security details, what to wear, what to bring, when to meet, where to meet, what to say, and any other logistical information or arrangements;
- iii. that are Social Media documents concerning the Events;
- iv. you created during the Events, including Social Media, text messages, video, and photographs;
- v. concerning African Americans, Jewish individuals, or other religious, racial, or ethnic minorities that relate in any way to the Events;
- vi. concerning any statement or action attributed to You in the Amended Complaint; or
- vii. concerning any allegation of an altercation, violent act, injury, or instance of intimidation or harassment that occurred during the Rally, including but not limited to James Fields' vehicular incident; or
- viii. concerning any funding of the Events, including for transportation, housing, food, weapons, uniforms, signage, tiki torches, or other materials or services used in connection with the Events (or the planning thereof)..

ANSWER: None unless in the possession of Traditionalist Worker Party itself. What I would have had was involuntarily removed by Facebook, Twitter, etc.

2. All Documents and Communications concerning events, meetings, rallies, conferences, or conversations held prior to the Events that relate to the Events in any way.

ANSWER: None unless in the possession of Traditionalist Worker Party itself. What I would have had was involuntarily removed by Facebook, Twitter, etc.

3. All Documents concerning and all Communications concerning or with East Coast Knights of the Ku Klux Klan (or East Coast Knights of the True Invisible Empire), Fraternal Order of the AltKnights, Identity Europa (or Identity Evropa), League of the South, Loyal White Knights of the Ku Klux Klan (or Loyal White Knights Church of the Invisible Empire Inc.), Moonbase Holdings, LLC, Nationalist Socialist Movement, Nationalist Front (or Aryan National Alliance), Traditionalist Worker Party, Vanguard America, or any such other social group or organization that has as part of its agenda a racial, religious, or ethnic objective.

ANSWER: None unless in the possession of Traditionalist Worker Party itself. What I would have had was involuntarily removed by Facebook, Twitter, etc.

4. All Documents and Communications concerning violence, intimidation, or harassment of Persons on the basis of race, religion, or ethnicity, including but not limited to, ethnic cleansing, white genocide, a white ethno-state, or any other form of large or small scale violence.

ANSWER: None unless in the possession of Traditionalist Worker Party itself. What I would have had was involuntarily removed by Facebook, Twitter, etc.

5. For any Social Media account You had from January 1, 2015, to the present: i. Documents and Communication sufficient to show the account home page, and all uses of Social Media for that account that reference or concern the Events or Defendants in any way. ii. Documents and Communication sufficient to show all Your "friends" and/or "social connections" maintained on Your account, including their names, addresses, and social network usernames or handles.

ANSWER: None unless in the possession of Traditionalist Worker Party itself. What I would have had was involuntarily removed by Facebook, Twitter, etc.

6. All Documents concerning and all Communications concerning or with any Plaintiff or Defendant (other than You) named in the Amended Complaint, and any other Person who attended, planned or was involved in the Events.

ANSWER: None unless in the possession of Traditionalist Worker Party itself. What I would have had was involuntarily removed by Facebook, Twitter, etc.

7. All Documents and Communications concerning any lawsuits, claims of violence, or arrests relating to or arising out of racially, ethnically, or religiously motivated conduct by You or any Defendant named in the Amended Complaint.

ANSWER: None unless in the possession of Traditionalist Worker Party itself. What I would have had was involuntarily removed by Facebook, Twitter, etc.

8. All Documents and Communications concerning the steps you have taken to preserve Documents and Communications relevant to the lawsuit, including the Documents and Communications responsive to these Requests.

ANSWER: N/A.

Respectfully Submitted and as to Objections:

s/ James E. Kolenich PHV
James E. Kolenich
Ohio Bar Number: 0077084
Attorney for Jason Kessler
Kolenich Law Office
9435 Waterstone Blvd. #140
Cincinnati, OH 45249
(513) 444-2150
(513) 297-6065 (fax)
Email: Jek318@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on **April 6, 2018** **via email** upon: Mr. Yotam Barkai, Esq., Ms. Sequin Strohmeier Esq. **Attorneys for Plaintiffs** as follows: email: YBarkai@bsflp.com; sstrohmeier@kaplanandcompany.com

s/ James E. Kolenich PHV
James E. Kolenich

Acknowledgment

STATE OF Indiana

Personally appeared before me Matthew Heimbach, on April 11, 2018 (date) and did swear that the above responses to interrogatories and requests for production of documents are true and correct to the best of his knowledge on the date listed in this acknowledgement.

[Signature]

Matthew Heimbach

[Signature]

Notary Public

Printed Name: Jessica Parrott

My Commission Expires: October 26, 2025

